

AIR EMISSION PERMIT NO. 04900065- 001

IS ISSUED TO

Bergquist Co - Cannon Falls
301 West Washington Street
Cannon Falls, Goodhue County, Minnesota 55009

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type	Application Date
Total Facility Operating Permit	June 12, 1995

This permit authorizes the permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal ; Part 70, Limits to avoid NSR
Issue Date: January 3, 2001
Expiration: January 3, 2006
All Title I Conditions do not expire.

Ann M. Foss
Manager
North/South Major Facilities

For Karen A. Studders
Commissioner
Minnesota Pollution Control Agency

CM:yma

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NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(651) 296-6300
Outside Metro Area	1-800-657-3864
TTY	(651) 282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Certain requirements, which have been determined not to apply, are listed in Table A of this permit.

Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

The Bergquist Company (SIC code 3679) manufactures silicone rubber insulation products. The facility constructed in 1986 consists of three buildings, which house Tower Coater 1 in building one; the coating, lamination, mixing, and assembly/finishing operations in building 3. Building three also houses Tower Coater 2 and the lab coater, which are parts of the manufacturing process.

The process involves silicone milling, dispersion mixing, web coating, parts cleaning, and assembly operations. The control equipment, thermal oxidizers for each of Tower Coaters one and two are located between buildings 1 and 2. The lab coater and Primer/Coater Laminator are vented through control equipment, an additional thermal oxidizer. Each of the coaters is contained in an enclosure. A separate thermal oxidizer serves the drum mixing station. Each mixing station is contained in an enclosure while all the enclosures are routed to the thermal oxidizer.

The volatile organic compounds are captured and routed through the thermal oxidizers that operate at 1400 degrees Fahrenheit based on the manufacturers recommended operation of the thermal oxidizer. The most recent testing demonstrating adequate thermal destruction was conducted at 1450 degrees Fahrenheit and demonstrated greater than 99 percent destruction. However, a letter was written to the company indicating that those results would not be use for MPCA submittals. The testing preceding the last test on the thermal oxidizers demonstrated greater than 95 percent destruction at lower temperature. Therefore requiring the company to operate at a minimum of 1400 degrees Fahrenheit which is the manufactures recommended temperature; and which is a higher temperature than the test that preceded the last test; assures that adequate destruction will be achieved that complies with the provisions of the permit. Additional testing will be required during the first year of the permit. Capture of 100 percent and destruction of 95 percent is required.

The criteria air pollutants of concern are the volatile organic compounds (VOCs). However, the facility has a potential to emit less than 250 tons per year VOC's by accepting Title I conditions on equipment not subject to 40 CFR pt. 60, subpart VVV to be considered a synthetic minor facility for VOCs.

The permittee is choosing to limit the amount of hazardous air pollutant (HAP) containing chemicals to control the emissions to a rate of less than 9.9 tons per year for one HAP and a combined limit of 24.9 tons per year for all HAPS. This enables the permittee to remain a synthetic minor source for hazardous air pollutants. The hazardous air pollutants of xylene, toluene, and methyl ethyl ketone are potentially emitted from this facility.

The Tower coater one and the lab coater were constructed or under contract prior to April 30, 1987 and are therefore not subject to 40 CFR pt. 60, subp. VVV, "Standards for Polymeric Coating of Supporting Substrates Facilities" conditions. The facility is accepting Title I conditions to limit emissions and avoid classification as a major source under 40 CFR § 52.21 on the equipment not subject to subpt. VVV.

Tower coater 2, the drum mixing area and the primer laminator were constructed after April 30, 1987, and are subject to 40 CFR pt. 60 subp. VVV.

The Durabond line as described in the permit application was removed from the plant and relocated in Wisconsin, the week of February 9, 1998. Touch screen manufacturing process was relocated to Cannon Falls from Wisconsin in 1999. The touch screen process was determined to be an insignificant activity.

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/03/01

Facility Name: Bergquist Co - Cannon Falls

Permit Number: 04900065 - 001

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item:	Total Facility
What to do	Why to do it
Total Facility Limit	hdr
HAP-Single: less than or equal to 9.9 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period. Usage records shall be kept on a daily basis.	Title I Condition: Limit to avoid major source classification under 40 CFR Section 63.2
HAPs - Total: less than or equal to 24.9 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period. Usage records shall be kept on a daily basis.	Title I Condition: Limit to avoid major source classification under 40 CFR Section 63.2
VOC usage: The permittee is required to record VOC usage on a 12-month rolling sum to be calculated by the 15th day of each month for the previous 12-month period. Usage records shall be kept on a daily basis. All emission units or stacks as allowed in this permit shall be included in this calculation. VOC contents for each VOC-containing material shall be determined as described under the Material Content requirement.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21
All emission units or stacks as allowed in this permit shall be included in the HAP calculation. HAP contents for each HAP-containing material (i.e. coatings, gun cleaner,...) shall be determined as described under the Material Content requirement.	Title I Condition: Limit to avoid major source classification under 40 CFR Section 63.2
Material Content: VOC, HAPs, and Solids (PM and PM<10 microns) contents in coating materials shall be determined by the Material Safety Data Sheet (MSDS) provided by the supplier for each material used. If a material content range is given on the MSDS, the highest number in the range shall be used in all compliance calculations. Other alternative methods approved by the MPCA may be used to determine the VOC, HAPs, and solids contents. The Division Manager reserves the right to require the Permittee to determine the VOC, HAP, and solids contents of any material, according to EPA reference methods. If an EPA reference method is used for material content determination, the data obtained shall supersede the MSDS.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21; Limit to avoid major source classification under 40 CFR Section 63.2
Total Facility Requirements	hdr
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.	Minn. R. 7017.2025
General Performance Test (PT) Requirements: Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements. PT Notifications (written): due 30 days before each Performance Test PT Plan: due 30 days before each Performance Test PT Pre-test Meeting: due 7 days before each Performance Test PT Report: due 45 days after each Performance Test PT Report - Microfiche: due 105 days after each Performance Test	Minn. R. 7017.2030, subp. 1-4 and Minn. R. 7017.2035, subp. 1-2
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/03/01

Facility Name: Bergquist Co - Cannon Falls

Permit Number: 04900065 - 001

<p>Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.</p>	<p>Minn. R. 7011.0020</p>
<p>Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.</p> <p>At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.</p>	<p>Minn. R. 7019.1000, subp. 3</p>
<p>Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2.</p> <p>At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.</p>	<p>Minn. R. 7019.1000, subp. 2</p>
<p>Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.</p>	<p>Minn. R. 7019.1000, subp. 1</p>
<p>Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description:</p> <ol style="list-style-type: none"> 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation. 	<p>Minn. R. 7019.1000, subp. 1</p>
<p>Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.</p>	<p>Minn. R. 7019.1000, subp. 4</p>
<p>Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.</p>	<p>Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)</p>
<p>Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.</p>	<p>Minn. R. 7011.0150</p>
<p>Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.</p>	<p>Minn. R. 7007.1150 through Minn. R. 7007.1500</p>
<p>Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).</p>	<p>Minn. R. 7007.1400, subp. 1(H)</p>
<p>Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.</p>	<p>Minn. R. 7007.0800, subp. 5(B)</p>
<p>Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).</p>	<p>Minn. R. 7007.0800, subp. 5(C)</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/03/01

Facility Name: Bergquist Co - Cannon Falls

Permit Number: 04900065 - 001

Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
Emissions Inventory Report due 91 days after the end of each calendar year following Permit Issuance (April 1). To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3010
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/03/01

Facility Name: Bergquist Co - Cannon Falls

Permit Number: 04900065 - 001

Subject Item: CE 001 Direct Flame Afterburner

Associated Items: EU 001 Tower Coater #1

What to do	Why to do it
HAPs - Total: greater than or equal to 100 percent capture efficiency	Title I Conditions: Limit to avoid classification as major source under 40 CFR Section 63.2
HAPs - Total: greater than or equal to 95 percent destruction efficiency . The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency.	Title I Conditions: Limit to avoid classification as major source under 40 CFR Section 63.2
Volatile Organic Compounds: greater than or equal to 100 percent capture efficiency	Title I Conditions: Limit to avoid classification as major source under 40 CFR Section 52.21
Volatile Organic Compounds: greater than or equal to 95 percent destruction efficiency The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency.	Title I Conditions: Limit to avoid classification as major source under 40 CFR Section 52.21
Temperature: greater than or equal to 1400 degrees F using 3-hour Rolling Average at the Combustion Chamber until a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent performance test where compliance for VOC emissions was demonstrated	Title I Conditions: Limit to avoid classification as major source under 40 CFR Section 52.21; Minn. R. 7007.0800 subp. 4. B.
The permittee shall install, calibrate, maintain and operate according to the manufacturer's specifications a monitoring device that continuously indicates and records the combustion temperature of the incinerator. The monitoring device shall have an accuracy within +/- 1 percent of the temperature being measured in Celsius degrees.	Minn. R. 7007.0800 subp. 4. D.
Daily Inspections: The Permittee shall physically check the temperature recording device at least once each operating day to verify that it is working and recording properly.	Minn. R. 7007.0800, subp. 4 and 5
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment internal and external system components, including but not limited to the refractory, heat exchanger, and electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 2, 5, and 14
Record Keeping	hdr
The permittee shall record time periods of mixing or coating operations when the emission control device is malfunctioning or not in use.	Minn. R. 7007.0800 subp. 5. A.
The permittee shall record time periods of mixing or coating operations when each monitoring device is malfunctioning or not in use.	Minn. R. 7007.0800 subp. 5. A.
Reporting	hdr
The permittee shall report quarterly all three hour periods (during actual coating operations) during which the average combustion temperature of the device is more than 50 degrees F (28 degrees C) below the average combustion temperature of the device during the most recent performance test that demonstrated compliance. Reports shall be post marked within 30 days of the end of the reporting period.	Minn. R. 7007.0800 subp. 6. A.
The permittee shall submit a report quarterly for all periods during actual mixing and coating operations when a required monitoring device (if any) was malfunctioning or not operating. The permittee shall also include all periods during actual mixing or coating operations when the control device was malfunctioning or not operating. Reports shall be post marked within 30 days of the end of the reporting period.	Minn. R. 7007.0800 subp. 6. A.
If the permittee is not required to report quarterly noncompliance because no reportable periods have occurred, the permittee shall submit on the semiannual deviations report statements that clarify this fact.	Minn. R. 7007.0800 subp. 6. A.
PERFORMANCE TESTING	hdr
Performance Test: due before end of each 60 months starting 11/01/2001 to measure VOC destruction efficiency. The first test is due November 1, 2001, then every 60 months thereafter.	Title I Conditions: Testing associated with a Title I Condition; Minn. R. 7017.2020, subp. 1
For additional applicable performance test requirements see 'General Performance Test Requirements' in Table A, Subject Item "Total Facility".	

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/03/01

Facility Name: Bergquist Co - Cannon Falls

Permit Number: 04900065 - 001

Subject Item: CE 002 Direct Flame Afterburner

Associated Items: EU 002 Tower Coater#2

What to do	Why to do it
HAPs - Total: greater than or equal to 100 percent capture efficiency	Title I Conditions: Limit to avoid classification as major source under 40 CFR Section 63.2
HAPs - Total: greater than or equal to 95 percent destruction efficiency .The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency.	Title I Conditions: Limit to avoid classification as major source under 40 CFR Section 63.2
Volatile Organic Compounds: greater than or equal to 100 percent capture efficiency	40 CFR Section 60.742(b)(2)
Volatile Organic Compounds: greater than or equal to 95 percent destruction efficiency	40 CFR Section 60.742(b)(2)
Temperature: greater than or equal to 1400 degrees F using 3-hour Rolling Average at the Combustion Chamber until a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent performance test where compliance for VOC emissions was demonstrated	Minn. R. 7007.0800 subp. 4. B.
The permittee shall install, calibrate, maintain and operate according to the manufacturer's specifications a monitoring device that continuously indicates and records the combustion temperature of the incinerator. The monitoring device shall have an accuracy within +/- 1 percent of the temperature being measured in Celsius degrees.	40CFR Section 60.744 (e)
Daily Inspections: The Permittee shall physically check the temperature recording device at least once each operating day to verify that it is working and recording properly.	Minn. R. 7007.0800, subp. 4 and 5
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment internal and external system components, including but not limited to the refractory, heat exchanger, and electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 2, 5, and 14
Record Keeping	hdr
The permittee shall record time periods of mixing or coating operations when the emission control device is malfunctioning or not in use.	40 CFR Section 60.744 (i)
The permittee shall record time periods of mixing or coating operations when each monitoring device is malfunctioning or not in use.	40 CFR Section 60.744 (j)
Reporting	hdr
The permittee shall report quarterly all three hour periods (during actual coating operations) during which the average combustion temperature of the device is more than 50 degrees F (28 degrees C) below the average combustion temperature of the device during the most recent performance test that demonstrated compliance. Reports shall be post marked within 30 days of the end of the reporting period.	40 CFR Section 60.747 (d) (4)
The permittee shall submit a report quarterly for all periods during actual mixing and coating operations when a required monitoring device (if any) was malfunctioning or not operating. The permittee shall also include all periods during actual mixing or coating operations when the control device was malfunctioning or not operating. Reports shall be post marked within 30 days of the end of the reporting period.	40 CFR60.747(F)
If the permittee is not required to report quarterly noncompliance because no reportable periods have occurred, the permittee shall submit on the semiannual deviations report statements that clarify this fact.	40CFR60.747(d)(7)
PERFORMANCE TESTING	hdr
Performance Test: due before end of each 60 months starting 11/01/2001 to measure VOC destruction efficiency. The first test is due November 1, 2001, then every 60 months thereafter.	Minn. R. 7017.2020, subp. 1
For additional applicable performance test requirements see 'General Performance Test Requirements' in Table A, Subject Item "Total Facility".	

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/03/01

Facility Name: Bergquist Co - Cannon Falls

Permit Number: 04900065 - 001

Subject Item: CE 003 Direct Flame Afterburner

Associated Items: EU 003 Lab Coater

EU 005 Primer Coater/ Laminator

What to do	Why to do it
HAPs - Total: greater than or equal to 100 percent capture efficiency	Title I Conditions: Limit to avoid classification as major source under 40 CFR Section 63.2
HAPs - Total: greater than or equal to 95 percent destruction efficiency .The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency.	Title I Conditions: Limit to avoid classification as major source under 40 CFR Section 63.2
Volatile Organic Compounds: greater than or equal to 100 percent capture efficiency	40 CFR Section 60.742(b)(2) For EU006; Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21 for unit EU003
Volatile Organic Compounds: greater than or equal to 95 percent destruction efficiency	40 CFR Section 60.742(b)(2) For EU006; Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21 for unit EU003
Temperature: greater than or equal to 1400 degrees F using 3-hour Rolling Average at the Combustion Chamber until a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent performance test where compliance for VOC emissions was demonstrated	Minn. R. 7007.0800 subp. 4. B.
The permittee shall install, calibrate, maintain and operate according to the manufacturer's specifications a monitoring device that continuously indicates and records the combustion temperature of the incinerator. The monitoring device shall have an accuracy within +/- 1 percent of the temperature being measured in Celsius degrees.	40 CFR Section 60.744(e) For EU006;
Daily Inspections: The Permittee shall physically check the temperature recording device at least once each operating day to verify that it is working and recording properly.	Minn. R. 7007.0800, subp. 4 and 5
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment internal and external system components, including but not limited to the refractory, heat exchanger, and electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 2, 5, and 14
Record Keeping	hdr
The permittee shall record time periods of mixing or coating operations when the emission control device is malfunctioning or not in use.	40 CFR Section 60.744 (i)
The permittee shall record time periods of mixing or coating operations when each monitoring device is malfunctioning or not in use.	40 CFR Section 60.744 (j)
Reporting	hdr
The permittee shall report quarterly all three hour periods (during actual coating operations) during which the average combustion temperature of the device is more than 50 degrees F (28 degrees C) below the average combustion temperature of the device during the most recent performance test that demonstrated compliance. Reports shall be post marked within 30 days of the end of the reporting period	40 CFR Section 60.747 (d) (4)
The permittee shall submit a report quarterly for all periods during actual mixing and coating operations when a required monitoring device (if any) was malfunctioning or not operating. The permittee shall also include all periods during actual mixing or coating operations when the control device was malfunctioning or not operating. Reports shall be post marked within 30 days of the end of the reporting period.	40 CFR60.747(F)
If the permittee is not required to report quarterly noncompliance because no reportable periods have occurred, the permittee shall submit on the semiannual deviations report statements that clarify this fact.	40CFR60.747(d)(7)
PERFORMANCE TESTING	hdr
Performance Test: due before end of each 60 months starting 11/01/2001 to measure VOC destruction efficiency. The first test is due November 1, 2001, then every 60 months thereafter.	Minn. R. 7017.2020, subp. 1
For additional applicable performance test requirements see 'General Performance Test Requirements' in Table A, Subject Item "Total Facility".	

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/03/01

Facility Name: Bergquist Co - Cannon Falls

Permit Number: 04900065 - 001

Subject Item: CE 004 Direct Flame Afterburner

Associated Items: EU 004 Drum Mixing Station

What to do	Why to do it
HAPs - Total: greater than or equal to 100 percent capture efficiency	Title I Conditions: Limit to avoid classification as major source under 40 CFR Section 63.2
HAPs - Total: greater than or equal to 95 percent destruction efficiency . The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency.	Title I Conditions: Limit to avoid classification as major source under 40 CFR Section 63.2
Volatile Organic Compounds: greater than or equal to 100 percent capture efficiency	40 CFR Section 60.742(b)(2)
Volatile Organic Compounds: greater than or equal to 95 percent destruction efficiency	40 CFR Section 60.742(b)(2)
Temperature: greater than or equal to 1400 degrees F using 3-hour Rolling Average at the Combustion Chamber until a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent performance test where compliance for VOC emissions was demonstrated	Minn. R. 7007.0800 subp. 4. B.
The permittee shall install, calibrate, maintain and operate according to the manufacturer's specifications a monitoring device that continuously indicates and records the combustion temperature of the incinerator. The monitoring device shall have an accuracy within +/- 1 percent of the temperature being measured in Celsius degrees.	40CFR Section 60.744 (e)
Daily Inspections: The Permittee shall physically check the temperature recording device at least once each operating day to verify that it is working and recording properly.	Minn. R. 7007.0800, subp. 4 and 5
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment internal and external system components, including but not limited to the refractory, heat exchanger, and electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 2, 5, and 14
Record Keeping	hdr
The permittee shall record time periods of mixing or coating operations when the emission control device is malfunctioning or not in use.	40 CFR Section 60.744 (i)
The permittee shall record time periods of mixing or coating operations when each monitoring device is malfunctioning or not in use.	40 CFR Section 60.744 (j)
Reporting	hdr
The permittee shall report quarterly all three hour periods (during actual coating operations) during which the average combustion temperature of the device is more than 50 degrees F (28 degrees C) below the average combustion temperature of the device during the most recent performance test that demonstrated compliance. Reports shall be post marked within 30 days of the end of the reporting period.	40 CFR Section 60.747 (d) (4)
The permittee shall submit a report quarterly for all periods during actual mixing and coating operations when a required monitoring device (if any) was malfunctioning or not operating. The permittee shall also include all periods during actual mixing or coating operations when the control device was malfunctioning or not operating. Reports shall be post marked within 30 days of the end of the reporting period.	40 CFR60.747(F)
If the permittee is not required to report quarterly noncompliance because no reportable periods have occurred, the permittee shall submit on the semiannual deviations report statements that clarify this fact.	40CFR60.747(d)(7)
PERFORMANCE TESTING	hdr
Performance Test: due before end of each 60 months starting 11/01/2001 to measure VOC destruction efficiency. The first test is due November 1, 2001, then every 60 months thereafter.	Minn. R. 7017.2020, subp. 1
For additional applicable performance test requirements see 'General Performance Test Requirements' in Table A, Subject Item "Total Facility".	

TABLE B: SUBMITTALS

01/03/01

Facility Name: Bergquist Co - Cannon Falls
Permit Number: 04900065 - 001

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

Permit Technical Advisor
Permit Section
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Unless another person is identified in the applicable Table, send all other submittals to:

Supervisor
Compliance Determination Unit
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

01/03/01

Facility Name: Bergquist Co - Cannon Falls

Permit Number: 04900065 - 001

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility

TABLE B: RECURRENT SUBMITTALS

01/03/01

Facility Name: Bergquist Co - Cannon Falls

Permit Number: 04900065 - 001

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31.	Total Facility
Compliance Certification	due 31 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year. The EPA copy shall be sent to: Mr. George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, Air and Radiation Division, EPA Region V, 77 West Jackson Boulevard, Chicago, Illinois 60604	Total Facility

APPENDIX MATERIAL

Facility Name: Bergquist Co - Cannon Falls

Permit Number: 04900065-001

The insignificant activities include 19 space heaters located throughout the facility heated with natural gas, the lab hood, two 2,000 gallon Xylene tanks, touch screen manufacturing, and the milling area where dust generated from the milling process is drawn through a cyclone followed by baghouse. The exhaust air from the baghouse is recirculated to the milling room 100 % of the time allowing it to qualify as an insignificant activity. The space heaters qualify as an insignificant activity under the list of insignificant activities. The lab hood is considered to be an insignificant activity and is estimated to generate 0.16 tons per year of emissions from Xylene. The emissions from the Xylene tanks were calculated at 0.006 tons per year each. The adhesives used in the touch screen process are estimated at less than 100 pound per year. Adding this maximum potential to the actual emissions identified in the permit application, the facility still could remain a synthetic minor source. The insignificant activities result in 0.27 tons per year in VOCs and would not increase the potential to emit beyond the 250 tons per year threshold. No periodic monitoring has been established for the insignificant activities because the low potential to emit would not elevate the facility to a major source.

After the permit was placed on public notice the company submitted notification of the addition of a non-solvent bearing coater. The company is installing a new infrared (IR) baking oven for this line. Infrared ovens are also considered an insignificant activity. The anticipated potential to emit from this source is 0.24 tons annual and would not increase the VOC potential beyond the 250 ton per year threshold.

Insignificant Activities and Applicable Requirements

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
3(A)	Fuel use: space heaters fueled by, kerosene, natural gas, or propane.	Minn. R. 7011.0510/0515
3(B)	Furnaces, boilers, and incinerators:	
	infrared electric ovens; and	Minn. R. 7011.0105/0110
	fuel burning equipment with a capacity less than 500,000 Btu/hour but only if the total combined capacity of all fuel burning equipment at the stationary source with a capacity less than 500,000 Btu per hour is less than or equal to 2,000,000 Btu/hour.	Minn. R. 7011.0510/0515 OR Minn. R. 7011.0610 + Minn. R. 7011.1215
3(C)	Fabrication operations: equipment used exclusively for forging, pressing, drawing, spinning, or extruding hot metals.	Minn. R. 7011.0710/0715
3(D)	Processing operations:	
	1. open tumblers with a batch capacity of 1,000 pounds or less; and	Minn. R. 7011.0710/0715
	2. Equipment venting particulate matter (PM) or particulate matter less than 10 microns (PM-10) inside a building, provided that emissions from the equipment are: a). filtered through an air cleaning system; and b). vented inside of the building 100% of the time.	Minn. R. 7011.0710/0715
3(E)	Storage tanks:	
	1. gasoline storage tanks with a combined total tankage capacity of not more than 10,000 gallons; and	Minn. R. 7011.0710/0715 OR Minn. R. 7011.1505, subp. 2(B)/1505, subp. 3(B) OR Minn. R. 7011.0105/0110 (<i>if not associated with industrial process per the IPE definition</i>)
	2. non-hazardous air pollutant VOC storage tanks with a combined total tankage capacity of not more than 10,000 gallons of non-hazardous air pollutant VOCs and with a vapor pressure of not more than 1.0 psia at 60 degrees Fahrenheit.	Minn. R. 7011.0710/0715 OR Minn. R. 7011.1505, subp. 2(B)/1505, subp. 3 (B) OR Minn. R. 7011.0105/0110
3(F)	Cleaning operations: commercial laundries, not including dry cleaners and industrial launderers.	Minn. R. 7011.0105/0110
3(G)	Emissions from a laboratory, as defined in the subpart.	Minn. R. 7011.0510/0515 + Minn. R. 7011.0610 + Minn. R.

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
		7011.0710/0715
3(H)	Miscellaneous:	
	1. total usage of less than 200 gallons of VOC (including hazardous air pollutant-containing VOC) combined in any consecutive 12 months period at a stationary source;	Minn. R. 7011.0710/0715 OR Minn. R. 7011.0105/0110
	2. equipment used exclusively for packaging lubricants or grease;	Minn. R. 7011.0710/0715 OR Minn. R. 7011.0105/0110
	3. equipment used for hydraulic or hydrostatic testing;	Minn. R. 7011.0710/0715
	4. brazing, soldering or welding equipment;	Minn. R. 7011.0510/.0515 + Minn. R. 7011.0610 + Minn. R. 7011.0710/0715
	5. blueprint copiers and photographic processes;	Minn. R. 7011.0105/0110
	6. equipment used exclusively for melting or application of wax;	Minn. R. 7011.0510/.0515 + Minn. R. 7011.0610 + Minn. R. 7011.0710/0715
	7. nonasbestos equipment used exclusively for bonding lining to brake shoes; and	Minn. R. 7011.0710/0715
	8. cleaning operations: alkaline/phosphate cleaners and associated cleaners and associated burners.	Minn. R. 7011.0510/.0515 + Minn. R. 7011.0610 + Minn. R. 7011.0710/0715
3(I)	Individual emissions units at a stationary source, each of which have a potential to emit the following pollutants in amounts less than: 1. 4,000 lbs/year of carbon monoxide; and 2. 2,000 lbs/year each of nitrogen oxide, sulfur dioxide, particulate matter, particulate matter less than ten microns, volatile organic compounds (including hazardous air pollutant-containing VOC), and ozone.	Two 2000 gallon Xylene tanks.
3(J)	Fugitive Emissions from roads and parking lots.	Minn. R. 7011.0150
3(K)	Infrequent use of spray paint equipment for routine housekeeping or plant upkeep activities not associated with primary production processes at the stationary source, such as spray painting of buildings, machinery, vehicles, and other supporting equipment.	Minn. R. 7011.0710/0715

TECHNICAL SUPPORT DOCUMENT
For
DRAFT AIR EMISSION PERMIT NO. 04900065-001

This Technical Support Document (TSD) is for all the interested parties of the draft permit. The purpose of this document is to set forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

1. General Information

1.1. Applicant and Stationary Source Location:

Owner and Operator Address and Phone Number (list both if different)	Facility Address (SIC Code: 3679)
Bergquist Company 5300 Edina Industrial Boulevard Edina, Minnesota 55439	301 West Washington Street Cannon Falls Goodhue County

1.2. Description of the facility

The Bergquist Company (SIC code 3679) manufactures silicone rubber insulation products. The facility constructed in 1986 consists of three buildings, which house Tower Coater 1 in building one; the coating, lamination, mixing, and assembly/finishing operations in building 3. Building three also houses Tower Coater 2 and the lab coater, which are parts of the manufacturing process.

The process involves silicone milling, dispersion mixing, web coating, parts cleaning, and assembly operations. The control equipment, thermal oxidizers for each of Tower Coaters one and two are located between buildings 1 and 2. The lab coater and Primer/Coater Laminator are vented through control equipment, an additional thermal oxidizer. Each of the coaters is contained in an enclosure. A separate thermal oxidizer serves the drum mixing station. Each mixing station is contained in an enclosure while all the enclosures are routed to the thermal oxidizer.

The volatile organic compounds are captured and routed through the thermal oxidizers that operate at 1400° F based on the manufacturers recommended operation of the thermal oxidizer. The most recent testing demonstrating adequate thermal destruction was conducted at 1450° F and demonstrated greater than 99% destruction. However, a letter was written to the company indicating that those results would not be use for MPCA submittals. The testing preceding the last test on the thermal oxidizers demonstrated greater than 95 % destruction at lower temperature. Therefore requiring the company to operate at a minimum of 1400° F which is the manufactures recommended temperature; and which is a higher temperature than the test that preceded the last test; assures that adequate destruction will be achieved that complies with the provisions of the permit. Additional testing will be required during the first year of the permit. Capture of 100 percent and destruction of 95 percent is required.

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The criteria air pollutants of concern are the volatile organic compounds (VOCs). However, the facility has a potential to emit less than 250 tons per year VOCs by accepting Title I conditions on equipment not subject to 40 CFR pt. 60, subp. VVV, to be considered a PSD synthetic minor facility for VOCs.

The permittee is choosing to limit the amount of hazardous air pollutant (HAP) containing chemicals to control the emissions to a rate of less than 9.9 tons per year for one HAP and a combined limit of 24.9 tons per year for all HAPS. This enables the permittee to remain a synthetic minor source for HAPS. The hazardous air pollutants of xylene, toluene, and methyl ethyl ketone are potentially emitted from this facility.

The Tower coater one and the lab coater were constructed or under contract prior to April 30, 1987, and are therefore not subject to 40 CFR pt. 60, subp. VVV, "Standards for Polymeric Coating of Supporting Substrates Facilities" conditions. The facility is accepting Title I conditions to limit emissions and avoid classification as a major source under 40 CFR § 52.21, on the equipment not subject to subp. VVV.

Tower coater 2, the drum mixing area and the primer laminator were constructed after April 30, 1987, and are subject to 40 CFR pt. 60, subp. VVV.

The Durabond line as described in the permit application was removed from the plant and relocated in Wisconsin, the week of February 9, 1998. Touch screen manufacturing process was relocated to Cannon Falls from Wisconsin in 1999. The touch screen process was determined to be an insignificant activity.

1.3 Description of any changes allowed with this permit issuance

This is an issuance of a total facility permit. There are no operational changes authorized as a result of this permit action. Operational changes have been identified in the permits and amendments listed in part 1.4.

1.4 Description of all amendments issued since the issuance of the last total facility permit and to be included in the Part 70 Permit.

Permit Number and Issuance Date	Action Authorized
2212-88-OT-1 June 13, 1988	Total Facility Operating Permit for Bergquist Company, facility to manufacture silicone rubber insulation.
Amendment I August 31, 1988	Modifications to the type of solvents used on source number 1 (production coater)
Amendment II August 19, 1992	Installation and operation of a second tower coater with an afterburner and drum mix station with an afterburner
2212A-93-I/O-1 October 13, 1993	Installation and operation of the DuraBOND Line
04900065-003 (2212A-94-I/O-2)	Installation and operation of a Primer Coater/ Laminator and an associated thermal oxidizer. The permit also authorizes the existing Lab coater to be moved. In it's new location the emissions from the lab coater will be controlled by the new thermal oxidizer.

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1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary:

EU #	SV#	Emission Unit Description	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
001	001	Tower coater 1	0.29	0.29	0.01	2.42	2.03	69.43	47.22	69.27
002	002	Tower coater 2	0.44	0.44	0.02	3.63	3.05	50.45	50.22	50.22
003	003	Lab coater						9.53	9.19	9.53
004	004	Drum Mixer	0.07	0.07	0.004	0.58	0.49	17.37	12.55	14.21
006	003	Primer coater laminator	0.21	0.21	0.01	1.75	1.47	18.38	0	18.26
			PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions*			1.01	1.01	0.05	8.38	7.04	165.16	9.9**	24.9**
Total Facility Actual Emissions*			0.49	0.49	0.025	4.09	0.86	10.28	8.71	9.11

*These are the limited potential emissions from column 3 in GI-07 from Delta. They differ from those in the permit application sent by the company in that they have been verified and corrected as need be by MPCA staff. These are the potential emissions that would appear in a public notice.

** This is based on the facility material usage limit and subsequent tracking.

Table 2. Facility(TF) and Permit Classification

Classification (put x in appropriate box)	Major/Affected Source	*Synthetic Minor	*Minor
PSD (list pollutant)		VOC	PM, PM10,SO _x , NO _x , CO,
NAAR (list pollutant)	none	none	none
Part 70 Permit Program (list pollutant)	VOC	HAP	PM, PM10,SO _x , NO _x , CO,

* Refers to potential emissions that are less than those specified as major by 40 CFR § 52.21, 40 CFR pt. 51 Appendix S, and 40 CFR pt. 70.

2. Regulatory and/or Statutory Basis

Summary Regulatory and/or Statutory Basis of the Emission or operational Limit

Regulatory Overview of Facility

EU, GRP, or SV #	Applicable Regulations	Comments:
Total Facility	40 CFR § 70.2; 40 CFR § 63.2	Title I conditions: limit to avoid classification as a major source under 40 CFR Section 52.21; Limited to less than 9.9 tons per year for a single HAP
Total Facility	40 CFR § 70.2; 40 CFR § 63.2	Title I conditions: limit to avoid classification as a major source under 40 CFR Section 52.21; Limited to less than 24.9 tons per year for total HAPs
Total Facility	40 CFR § 70.2; 40 CFR § 63.2	Record Material usage for VOCs on a daily basis and compute a 12 month rolling sum on a monthly basis
Total Facility	40 CFR § 70.2; 40 CFR § 63.2	Record Material usage for single and combined HAPs on a daily basis and compute a 12 month rolling sum on a monthly basis
CE001	Minn. R.7007.0100	Title I conditions: limit to avoid classification as a major source under 40 CFR Section 52.21; Limit the VOCs emitted
CE001	Periodic Monitoring Minn. R. 7007.0800 subp. 5	The permittee shall monitor the combustion temperature of the thermal oxidizer continuously.

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CE001	Periodic Monitoring Minn. R. 7007.0800, subp. 5	The permittee shall record periods when the emission control device is malfunctioning or not in use.
CE001	Periodic Monitoring Minn. R. 7007.0800, subp. 5	The permittee shall record period when each monitoring device is malfunctioning or not in use.
CE001	Periodic Monitoring Minn. R. 7017.2020, subp. 1	Performance testing required of the thermal oxidizer every 60 months.
CE002 CE003 CE004	40 CFR § 60, subp. VVV	Standards for Polymeric Coating of Supporting Substrates Facilities
CE002 CE003 CE004	Periodic Monitoring 40 CFR § 60.744 (e)	The permittee shall monitor the combustion temperature of the thermal oxidizer continuously.
CE002 CE003 CE004	Periodic Monitoring 40 CFR § 60.744 (i)	The permittee shall record periods when the emission control device is malfunctioning or not in use.
CE002 CE003 CE004	Periodic Monitoring 40 CFR § 60.744 (j)	The permittee shall record period when each monitoring device is malfunctioning or not in use.
CE002 CE003 CE004	Periodic Monitoring Minn. R. 7017.2020, subp. 1	Performance testing required of the thermal oxidizer every 60 months.

3. Technical Information

The facility is a synthetic minor for VOC's by taking Title I conditions to operate and maintain 100 percent capture and 95 percent destruction efficiency on the thermal oxidizer that serves tower coater 1 and according to the data supplied on the EC07 forms. Because the data indicate the potential to emit is less than 250 tons per year VOCs, a limit for VOCs is not included in this air quality permit.

Because the potential to emit for a single HAP is greater than 10 tons per year and greater than 25 tons per year for all the combined HAPS, the permittee requested limits for single and combined HAPS to be considered a synthetic minor for Hazardous Air Pollutants. The permittee shall have a limit of 9.9 tons per year for a single hazardous air pollutant and combined limit of 24.9 tons per year to remain a synthetic minor source for Xylene, Toluene and MEK. The permittee is phasing out the use of hazardous air pollutants in the production process. The permittee has demonstrated less than 9.9 tons per year emissions on the semi annual emissions submittal from 1998 and 1999 as well as the permit application which identifies 8.71 tons per year from a single HAP and combined emissions of 9.11 tons per year.

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The Potential To Emit was calculated based on the EC07 forms submitted by the permittee that details the VOC content and application rate for the various emissions units, and AP42 attributable to the mixing area. The mass varies from the application because the insignificant activities were not included in the potential to emit and minor mathematical corrections. Additionally the Durabond line has been relocated to Wisconsin the week of Feb. 9, 1998, according to documentation in the air quality file.

The insignificant activities are listed in the permit appendix. Those activities include 19 space heaters located throughout the facility heated with natural gas, the lab hood, two 2,000 gallon Xylene tanks, touch screen manufacturing and the milling area where dust generated from the milling process is drawn through a cyclone followed by baghouse. The exhaust air from the baghouse is recirculated to the milling room 100 percent of the time allowing it to qualify as an insignificant activity. The space heaters qualify as an insignificant activity under the list of insignificant activities. The lab hood is considered to be an insignificant activity and is estimated to generate 0.16 tons per year of emissions from Xylene. The emissions from the Xylene tanks were calculated at 0.006 tons per year each tank. The adhesives used in the touch screen process are estimated at less than 100 pound per year. Adding this maximum potential to the actual emissions identified in the permit application, the facility still remains a synthetic minor source. The insignificant activities result in 0.27 tons per year in VOCs and would not increase the potential to emit beyond the 250 tons per year threshold. No periodic monitoring has been established for the insignificant activities because the low potential to emit would not elevate the facility to a major source.

After the permit was placed on public notice the company submitted notification of the addition of a non-solvent bearing coater. The company is installing a new infrared (IR) baking oven for this line. Infrared ovens are also considered an insignificant activity. The anticipated potential to emit from this source is 0.24 tons annual and would not increase the VOC potential beyond the 250 ton per year threshold.

4. Conclusion

Based on the information provided by the Bergquist Company of Cannon Falls, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 04900065-001 and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Connie Minetor, Dave Beil,

Attachment: Calculations

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